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February 26, 2020

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
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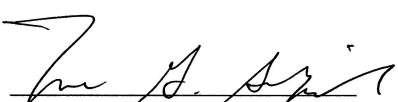
Re: Jose Ramirez v. M.L. San Jose Enterprises, Corp.
(d/b/a Liberato Restaurant), SDNY Case No. 19
Civ. 3429 (LGS)

Dear Judge Schofield,

Our office represents Plaintiff Jose Ramirez in the above-referenced matter. I am writing on behalf of the parties to respectfully request an adjournment of the status conference, from Thursday, March 12, 2020, to any of the following dates:

1. April 21, 2020
2. April 22, 2020
3. April 23, 2020
4. April 24, 2020
5. April 28, 2020
6. April 29, 2020

APPLICATION GRANTED. The final case management conference is adjourned from March 12, 2020, at 10:30 A.M. to April 23, 2020, at 10:30 A.M.
Dated: February 27, 2020
New York, New York

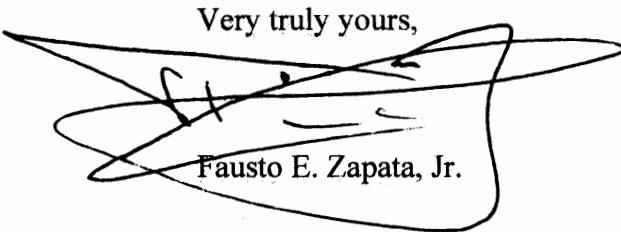


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Plaintiff has made two applications seeking adjournments of the initial pretrial conference, which Your Honor granted on June 25, 2019, and June 27, 2019. Additionally, Plaintiff made one application for extensions of time to publish notice to prospective FLSA collective action members and the parties have made two joint application seeking an expansion of the discovery deadlines, all of which were granted on November 12, 2019, December 2, 2019, and February 20, 2020. (Dkt. Nos. 43, 48, 57.)

The parties are making this joint application because the discovery deadline has been extended from February 27, 2020, to March 26, 2020, and the parties believe that conducting the status conference after the close of discovery will be more efficient and reduce delay. Moreover, Your Honor's had originally scheduled the status conference to take place after the close of discovery. Thank you for your consideration.

Very truly yours,



Fausto E. Zapata, Jr.

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